

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-PJC
Plaintiff	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	

**DECLARATION OF DANIEL NAZER IN SUPPORT OF MOZILLA'S
MOTION TO DISMISS**

I, Daniel Nazer, declare as follows:

1. I am over the age of 18 and am competent to make this declaration. I provide this declaration in support of Mozilla Corporation's ("Mozilla") motion to dismiss filed in the above-captioned case. Unless I state otherwise, the facts in this declaration are based on my personal knowledge of the corporate structure of Mozilla and investigation of Mozilla's records that track Mozilla's office space, or other real property. If called to testify as a witness in this matter, I could and would testify truthfully to each of the facts set forth below.

2. I am a Senior IP and Product Counsel. I have worked at Mozilla since April 2019. As a result of my work at Mozilla, I am knowledgeable about the locations of Mozilla's offices.

3. Mozilla was incorporated in California in 2005.

4. Mozilla has been headquartered in the Northern District of California since its establishment in 2005. It has been headquartered in Mountain View, California, from 2005 to 2020, and in San Francisco, California, since 2020, both in the Northern District of California.

5. I understand that the Middle District of Pennsylvania is defined as consisting of the counties identified on the Court's website at <https://www.pamd.uscourts.gov/court-info/court-locations>.

6. Based on my investigation, as of March 17, 2025, there are no records of Mozilla owning or leasing any office space, retail space, or other real property in the Middle District of Pennsylvania, and also no records as of the date of this Declaration.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 11th day of June 2025, in San Francisco, California.

DocuSigned by:

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Daniel Nazer